## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

JANE DOE 1 and JANE DOE 2,

Plaintiffs,

v.

BOARD OF REGENTS OF THE UNIVERSITY OF NEBRASKA,

Defendant.

Case No. 4:20-cv-03081

PLAINTIFFS' INDEX OF EVIDENCE IN SUPPORT OF BRIEF IN OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND MOTION TO EXCLUDE EXPERT TESTIMONY

Plaintiffs Jane Doe 1 and Jane Doe 2, by and through their undersigned counsel, respectfully submit this Index of Evidence in Support of their Brief in Opposition to Defendants' Motion for Summary Judgment (ECF No. 122) and Motion to Exclude Expert Testimony (Daubert) (ECF No. 123) filed by Defendant Board of Regents of the University of Nebraska ("BRUN"). Attached to this Index are true and correct copies of the following, to the extent the documents were not previously filed with this Court:

1. Declaration of Elizabeth Abdnour, attaching:

Exhibit 1: Excerpts from the Transcript of the Deposition of Jane Doe 1

Exhibit 2: Excerpts from the Transcript of the Deposition of Jane Doe 2

Exhibit 3: Excerpts from the Transcript of the Deposition of Josephine Doherty

Exhibit 4: Excerpts from the Transcript of the Deposition of Andrew Verzilli

Exhibit 5: Andrew Verzilli's Curriculum Vitae

## 2. Declaration of Plaintiff Jane Doe 1, attaching:

Exhibit 6: Doe 1 Response to Interrogatories

Exhibit 7: January 2018 emails with Officer Eric Fischer, P0450

Exhibit 8: June 2018 emails with Morgan Beal, P0592-0594

Exhibit 9: September 27, 2018 appeal, BRUNPRODJD1 0907-0908

Exhibit 10: December 2018 emails with Jake Johnson and Morgan Beal, P0662-0665

Exhibit 11: September 2019 emails with Jake Johnson, Susan Moore, Meagan

Counley, and Morgan Beal, P0616-0621

Exhibit 12: October 2019 emails with Jake Johnson, Susan Moore, and Morgan Beal

Exhibit 13: September 2019 complaint, P0514-0515

Exhibit 14: October 2019 Dear UNL emails, P0282-0283

Exhibit 31: DearUNL April 2019 List of Demands

Exhibit 32: DearUNL member February 2019 letter to President Ronnie Green

## 3. Declaration of Plaintiff Jane Doe 2, attaching:

Exhibit 15: Academic transcript, BRUNPRODJD2 4341-4344

Exhibit 16: April 2016 emails with Ross Miller, P2613

Exhibit 17: Spring 2017 Comparative Politics Comps, P2515, P2526, P2533-2535,

P2569-2570

Exhibit 18: August 2017 emails with Morgan Beal, P4113-4132

Exhibit 19: August-September 2017 emails with Morgan Beal, P2140-2151

Exhibit 20: November 2017 emails with Vince Powers, P4758-4759

Exhibit 21: November 2017 emails with Dona-Gene Barton, P1544-1548

Exhibit 22: November 2017 emails with Morgan Beal, P4206-4207

Exhibit 23: November-December 2017 emails with Morgan Beal, P4209-4217

Exhibit 24: December 2017 emails with Morgan Beal, P4239-4240

Exhibit 25: December 2017 emails with Morgan Beal, P4303-4306

Exhibit 26: March 2018 emails with Meagan Counley, P2086-2088

Exhibit 27: May 2018 emails with Jake Johnson, BRUNPRODJD2 1349-1352

Exhibit 28: June 2018 emails with Dona-Gene Barton, P1574-1580

Exhibit 29: July 2018 emails with Dona-Gene Barton, Terri Eastin, and Angela Bryan,

P1592-1598

Exhibit 30: Response to RFP No. 7, April 20 2017 email with classmates

DATED: November 1, 2024 Respectfully submitted,

/s/ Elizabeth K. Abdnour Elizabeth K. Abdnour 0081795 (OH), P78203 (MI)

Megan N. Mitchell

2102019 (AK), 53803 (CO), P87312 (MI)

ABDNOUR WEIKER, LLP 500 E. Michigan Ave., Ste. 130

Lansing, MI 48912 (517) 994-1776 (614) 417-5081

liz@education-rights.com megan@education-rights.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 1, 2024, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic system.

/s/ Elizabeth K. Abdnour Elizabeth K. Abdnour